

EXHIBIT C

Wilson Zuluaga
February 22, 2018

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2
3 UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

4 -----X
INDUSTRIA DE ALIMENTOS ZENU S.A.S.,

5 PLAINTIFF/COUNTER DEFENDANT

6
7 -against- Case No:
2:16-cv-06576-KM-MAH

8
9 LATINFOOD U.S. CORP. d/b/a ZENU PRODUCTS CO.
And WILSON ZULUAGA,

10 DEFENDANTS/COUNTER
11 CLAIMANTS/THIRD PARTY
PLAINTIFFS

12 -against-
13 CORDIALSA USA, INC.
14 THIRD-PARTY DEFENDANT
-----X

15 DATE: February 22, 2018

16 TIME: 1:20 P.M.

17 DEPOSITION of the Defendants,
18 LATINFOOD U.S. CORP. d/b/a ZENU PRODUCTS CO.,
19 Represented by WILSON ZULUAGA, taken by the
20 Plaintiff, pursuant to Notice and to the
21 Federal Rules of Civil Procedure, held at the
22 offices of Reed Smith, LLP, 599 Lexington
23 Avenue, New York, New York 10022, before
24 Robert X. Shaw, CSR, a Notary Public of the
25 State of New York.

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W I L S O N Z U L U A G A, called as a
witness, having been first duly sworn by a
Notary Public of the State of New York, was
examined and testified as follows:

EXAMINATION BY

MR. RAYMOND:

Q. Please state your name for the
record.

A. Wilson Zuluaga.

Q. What is your address?

A. 116 Franklin Avenue, Seldon, New
York 11784.

Q. Good afternoon, Mr. Zuluaga.

My name is Peter Raymond. I'm with
the firm of Reed Smith. Here is my colleague
Sarah Levitan. As you know, we represent the
Plaintiff Industria De Alimentos Zenu SAS,
which I'll refer to as either Plaintiff or
Industria to keep things moving more quickly.

We are here today to take a
relatively short deposition just on the issue
of spoliation. I'm going to limit my
questions to that issue. We won't be talking
about the merits of the underlying case.

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1 Wilson Zuluaga
2 the question before -- we don't take a break
3 in the middle of it, but once there's no
4 question pending, obviously you're free to
5 get up and move around whenever you feel like
6 it.

7 A. Thank you.

8 Q. Okay. So, let's get started.

9 You've given your full name and
10 address to the court reporter; is that
11 correct?

12 A. That's correct.

13 Q. Okay. I mentioned a few minutes
14 ago that we're here for the issue of
15 spoliation.

16 Do you have any understanding of
17 what that word means in this context?

18 A. It's been explained to me, that it
19 is the destruction of evidence, kind of like
20 that.

21 Q. Okay. And do you have any
22 understanding of whether you, as a party, or
23 the officer of a party to a litigation, have
24 an obligation to preserve relevant documents
25 and information?